

REMARKS**Claim Rejections - 35 USC § 103(a)**

Regarding claim 75, the office action states Ottesen et al. discloses a transformer (See Fig. 3, 30). The office equates applicant's term: "format-unspecified media content" to mean: "multimedia programs wherein the received multimedia are not digitally compressed yet."

Applicant has amended the claim language to clarify the distinction between Ottesen's device and applicant's device. According to Ottesen, "a multimedia program is coded in accordance with a predetermined compression standard and stored in a compressed digital format as sequentially ordered discrete program segments in the mass storage library" [Ottesen Abstract].

Applicant's device receives multimedia programs are received at applicant's input without regard to format. (See applicant's specification, page 13, lines 1-5).

Media Content, Media Content Description vs. Physical Storage Address/Video Segment Address

Applicant's claim recites, in relevant portion: "...said converter automatically and separately providing: at least one media block comprising **a portion of said media content** and a **description of said portion of media content**, wherein said description does not include ~~a storage~~ an address for said media block..."

The examiner has taken the position that Ottesen discloses "a description of said portion of said media content", by Ottesen's disclosure of video segment address identifiers. Ottesen states: A first video segment 48, for example, may be encoded or tagged with an address identifier of "A1", while the second discrete video segment 48 may be encoded with an address of "A2". As such, each of the discrete source

video segments 48 is preferably locatable within the storage device by reference to its unique address.” (Ottesen Col. 9, lines 62-68).

Applicant previously amended applicant's claims to recite that the “description of media content does not include a storage address for said media block”. The examiner maintains Ottesen's disclosure of an ‘address identifier A1’ discloses ‘a description of media content that does not include a storage address..’. The examiner maintains Ottesen's address identifiers A1, A2 to refer to: “an identifier used to identify and locate the video segment within the multimedia program.” (See Advisory Action of 4/30/2010).

Ottesen lacks any disclosure that an ‘address identifier’ is “an identifier used to identify and locate the video segment within the multimedia program.” Nonetheless, assuming for argument's sake that Ottesen's address identifier is used to “identify and locate the video segment with the multimedia program”, such a disclosure still does not teach applicants claimed description of media content (of a media block), wherein the description does not include a storage address”. This is because Ottesen lacks any teaching to provide a description of media content, whether or not any kind of address is additionally provided.

The examiner's interpretation notwithstanding, the following definition is expressly provided in Ottesen's disclosure with reference to ‘video segment address identifiers:

1. An address identifier is encoded on a segment.
2. An address identifier is unique to a video segment. “...each of the compressed video segments is preferably encoded with a unique segment address”. (Ottesen, Col. 9, lines 60-62.)
3. An address identifier serves to locate a discrete video segment within a storage device. “As such, each of the discrete source video segments 48 is preferably locatable within the storage device by reference to its unique address. (See Ottesen Col. 9 lines 65 to 67, to Col. 10 lines 1-5).

In contrast 1 above, applicant's claimed ‘description of media content’ is not encoded on a media block. For example, in embodiments of applicant's invention wherein a ‘description of media content’ comprises metadata, the metadata is stored

in a metadata memory, while the media content blocks are stored in a data storage. (See, e.g., applicant's specification page 17 last paragraph to page 18, first paragraph.

In contrast to 2 above, applicant's description need not be unique to a media block. For example in embodiments of applicant's invention wherein a 'description of media content' comprises metadata, (See charts on page 27, 28), an example description comprising a 'channel name' can correspond to more than one media block. In contrast to 3, applicant's description does not serve to locate a discrete video segment within a storage device. It serves to describe the content of an associated media block.

Applicant has amended claim 75 to delete the term "storage" with the aim of clarifying applicant's description of media content is neither a virtual storage address nor a physical storage address, nor does applicant's 'description' include any indication of any kind of address.

Therefore, applicant respectfully submits claims 75-78 are not obvious in view of Ottesen in view of another other reference or combination of references.

Having fully addressed the Examiner's rejections and in view of the preceding amendments and remarks, applicant believes this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited. The examiner is invited to call applicant's attorney at 215-584-1159 to resolve any outstanding issues to advance the prosecution of this case.

Respectfully submitted,

Date: 8/23/2010

By : /christinejohnson/
Christine Johnson, Esq.
Registration No. 38,507
Attorney for applicant